

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TILLIE SALTZMAN, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiff,

V.

CITIGROUP INC., CHARLES O. PRINCE,
ROBERT E. RUBIN, STEPHEN R. VOLK,
SALLIE L. KRAWCHECK, GARY L.
CRITTENDEN and ROBERT DRUSKIN,

Defendants.

07 CV 09901 (SHS) (FM)

CLASS ACTION

ECF CASE

LENNARD HAMMERSCHLAG, Individually
And on Behalf of All Others Similarly Situated,

Plaintiff,

V.

CITIGROUP INC., CHARLES PRINCE, SALLIE
KRAWCHECK and GARY CRITTENDEN,

Defendants.

07 CV 10258 (SHS)

CLASS ACTION

**DECLARATION OF JOSEPH H. WEISS IN SUPPORT OF THE MOTION OF DAVID
GARDEN FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
PURSUANT TO §21D(a)(3)(B) OF THE SECURITIES EXCHANGE ACT OF 1934
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

I, Joseph H. Weiss, hereby declare:

1. I am a principal of the law firm of Weiss & Lurie. I submit this Declaration in support of the motion of David Garden for consolidation, appointment as lead plaintiff and approval of selection of Weiss & Lurie as Lead Counsel.

2. Attached hereto as Exhibit A is a true and correct copy of the notice of pendency published over *Business Wire*, a national, business-oriented news wire service, on November 8, 2007.

3. Attached hereto as Exhibit B is a true and correct copy of the plaintiff certification executed by David Garden, which demonstrates Movant's class standing and requisite financial interest in the outcome of the litigation.

4. Attached hereto as Exhibit C is a chart summarizing the relevant transactions of David Garden in Citigroup common stock during the Class Period.

5. Attached hereto as Exhibit D is a true and correct copy of Weiss & Lurie's firm biography.

Signed under penalty of perjury this 7th day of January 2008.

By: /s/ Joseph H. Weiss
Joseph H. Weiss (JW-4534)
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On Behalf of Movant David Garden